



AIR TRANSPORT ASSOCIATION

October 16, 2002

U.S. Department of Transportation
Docket Management System
400 7th Street, SW, Room PL 401
Washington, DC 20591

Reference: **Docket Number FAA-2002-12461**
*Notice of Proposed Rulemaking: Flight Simulation Device Initial and
Continuing Qualification and Use*

Dear Sir or Madam:

On behalf of the member airlines of ATA,¹ we write to request that the comment period in this matter be extended to March 31, 2003.

This Notice of Proposed Rulemaking (NPRM) proposes to revise 14 CFR Parts 1, 60, 61, 63, 141, and 142, concerning the initial and continuing qualifications and use of flight simulation devices in commercial pilot training. The NPRM was published in the Federal Register on September 25, 2002. The comment period closes on December 24, 2002.

This is an extensive and complex NPRM that, when finalized, will have a significant impact on the future development and construction of pilot training curricula, training devices, and their uses. If finalized as proposed, this rule would have a tremendous impact on flight crew training, both in terms of flight operations training and economics.

Given its size, complexity and importance, the time permitted is not adequate to develop informed comments that address all of the substantive and cost-benefit issues that the NPRM raises. For this reason alone the comment period should be extended. However, in addition, personnel and operational demands placed on airlines during the holiday

¹ Airborne Express, Alaska Airlines, Aloha Airlines, America West Airlines, American Airlines, American Trans Air, Atlas Air, Continental Airlines, Delta Air Lines, DHL Airways, Emery Worldwide, Evergreen International Airlines, Federal Express, Hawaiian Airlines, JetBlue Airways, Midwest Express Airlines, Northwest Airlines, Polar Air Cargo, Southwest Airlines, United Airlines, United Parcel Service, and US Airways. Associate members are: Aerovias de Mexico, Air Canada, Air Jamaica, KLM-Royal Dutch Airlines, and Mexicana de Aviacion.

■
AIR TRANSPORT ASSOCIATION OF AMERICA, INC.

1301 PENNSYLVANIA AVENUE, NW SUITE 1100 WASHINGTON, DC 20004-1707
202.626.4000 www.airlines.org

season will add to the difficulty for our members to analyze the NPRM and develop substantive comments by December 24th.

Finally, the NPRM's references to FAR Part 121, Subparts N and O, add additional complexity that must be considered and addressed. Indeed, in our view this NPRM and Subparts N and O are very closely tied to each other. For this reason, we recommend that any proposed changes to Subparts N and O be coordinated with this rulemaking and, in particular, that any changes to Subparts N and O precede this rulemaking.

Thank you for your consideration of this request to extend the comment period to March 31, 2003. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "A. H. Prest", with a stylized flourish at the end.

Albert H. Prest
Vice President, Flight Operations

cc:

Mr. James Ballough, Director, Flight Standards Service, AFS-1
Mr. Anthony F. Fazio, Director, Office of Rulemaking, ARM-1